1 The Honorable Robert J. Bryan 2 3 4 5 UNITED STATES DISTRICT COURT FOR THE 6 WESTERN DISTRICT OF WASHINGTON AT TACOMA 7 UNITED STATES OF AMERICA, NO. 3:20-cv-6164-RJB 8 Plaintiff. 9 **CONSENT DECREE AND FINAL** v. **JUDGMENT** 10 **DEEDREANNE OTERO** 11 Defendant. 12 13 CONSENT DECREE AND FINAL JUDGMENT 14 Plaintiff, United States of America ("Plaintiff"), commenced the above-captioned action in 15 this Court with a complaint pursuant to 18 U.S.C. § 1345, alleging that Defendant, Deedreanne 16 Otero, is committing or about to commit a banking law violation as defined in 18 U.S.C. 17 § 3322(d), including international money laundering in violation of 18 U.S.C. § 1956(a)(2)(B). 18 Plaintiff and Defendant, pro se, wish to resolve Plaintiff's allegations without litigation and 19 jointly request and consent to the entry of this Consent Decree and Final Judgment ("Consent 20 Decree") without Defendant's admission of liability or wrongdoing. Defendant agrees to waive 21 service of the Summons and the Complaint. 22 23

1 Defendant has entered into this Consent Decree freely and without coercion. Defendant further acknowledges that she has read the provisions of this Consent Decree, understands them, 3 and is prepared to abide by them. 4 IT IS HEREBY ADJUDGED, ORDERED, AND DECREED as follows: 5 1. This Court has jurisdiction over this matter and the parties pursuant to 6 18 U.S.C. § 1345 and 28 U.S.C. §§ 1331 and 1345. Venue is proper in this District under 7 28 U.S.C. § 1391(b) and (c). 8 2. Defendant neither admits nor denies the allegations in the Complaint. Only for purposes of this action, Defendant admits the facts necessary to establish jurisdiction. 10 3. For purposes of this Consent Decree: 11 "Defendant" means Deedreanne Otero. a. 12 b. "Person" means an individual, a corporation, a partnership, or any other 13 entity. 14 "Funds" include any currency, check, money order, stored value card, 15 stored value card numbers, bank wire transmission, or other monetary value. 16 d. "Money transmitting business" refers to a person who, for a fee, receives 17 funds from one person for the purpose of transmitting the funds, or providing access to the 18 funds, to another person. 19 "Fee" refers to a payment or compensation of any kind regardless of how e. 20 the payment or compensation is labeled, including but not limited to processing fees, 21 service fees, expediting fees, purchase fees, nominal fees, symbolic payments, gifts and 22 gratuities. 23

1	4. Upon entry of this Decree, Defendant is permanently prohibited and enjoined
2	from, directly or indirectly, assisting, facilitating, or participating in any money transmitting
3	business.
4	5. Within five (5) days after entry of this Consent Decree, the Defendant is ordered
5	to submit to Postal Inspector Amy Kerkof a written acknowledgement of receipt of this Consent
6	Decree sworn under penalty of perjury. The statement shall be addressed to:
7	U.S. Postal Inspector Amy Kerkof U.S. Postal Inspection Service
8	P.O. Box 400 Seattle, WA 98111
9	206-442-6132 (desk)
10	6. The Consent Decree shall not be modified except in writing by Plaintiff and the
11	Defendant and approved by the Court.
12	7. This Consent Decree shall constitute a final judgment and order in this action.
13	8. This Court retains jurisdiction of this action for the purpose of enforcing or
14	modifying this Consent Decree and for the purpose of granting such additional relief as may be
15	necessary or appropriate.
16	
17	APPROVED AND ENTERED BY THIS COURT
18	Dated this 23 rd day of December, 2020.
19	A l AT
20	Maring Jongan
21	ROBERT J. BRYAN United States District Judge
22	
23	

1 2 We hereby consent to the entry of the foregoing Decree: 3 FOR DEFENDANT DEEDREANNE OTERO 4 5 Dated: November 24, 2020 6 7 FOR PLAINTIFF THE UNITED STATES OF 8 **AMERICA** 9 **BRIAN MORAN United States Attorney** 10 Dated: November 30, 2020 By: s/ Nickolas Bohl 11 NICKOLAS BOHL, WA #48978 Assistant United States Attorney 12 United States Attorney's Office 700 Stewart Street, Suite 5220 13 Seattle, Washington 98101-1271 Phone: 206-553-7970 14 Fax: 206-553-4067 Email: nickolas.bohl@usdoj.gov 15 16 17 18 19 20 21 22 23